

Simon Bailey
sbailey@bradley.com
601.592.9941 direct



November 9, 2023

Hon. Judge Henry T. Wingate
501 East Court Street
Suite 6.750
Jackson, MS 39201

RE: *United States v. City of Jackson*; 3:12-cv-000790-HTW-LGI

Dear Judge Wingate:

My client, Lakeland Seniors, LLC, has a pending motion for leave to file suit against Jxn Water, Inc. *See* Doc. 50. That motion has been briefed, and the would-be parties have submitted supplemental briefs. *See* Docs. 65, 71, 75, 77-1.

As a protective measure, to stay in front of applicable statutes of limitation, Lakeland Seniors must file suit in state court against Jxn Water and the other defendants (the City of Jackson and the University of Mississippi Medical Center) on Friday, November 10.

I have notified Jxn Water's counsel of this fact, and that Lakeland Seniors will not serve process on Jxn Water for at least 100 days.

The parties have not reached any formal agreement concerning this procedure and Jxn Water has not waived any rights, but Jxn Water is aware of what Lakeland Seniors is doing and the reason for it.

Thank you for your consideration of the pending motion.

Sincerely,

/s/ Simon Bailey

Simon Bailey